Written Submission

for the

Royal Society for the Protection of Birds

Response to the Examining Authority's First Written Questions

(ExQ1)

Submitted on for Deadline 3

30 September 2024

Planning Act 2008 (as amended)

In the matter of:

Application by Mona Offshore Wind Limited for an Order

Granting Development Consent for the Mona Offshore Wind Farm

Planning Inspectorate Ref: EN010137

RSPB Registration Identification Ref: 20048540

Contents

1. Introduction

1.1. RSPB Cymru's responses to the Examining Authority's First Written Questions (ExQ1) are set out in the table below.

ExQ1	Question to:	Question	RSPB response
1.17: Offshore Biodiversity, Ecology and Natural Environment - Ornithology			
Q1.17.15	The Applicant **RSPB Cymru**	Can you explain how the application considers the resilience of ecosystems and potential ornithology effects regarding: • displacement from foraging areas; • species energy expenditure; • impact on forage fish; and • ocean stratification (Irish sea). Can RSPB Cymru provide evidence addressing the four bullet points to demonstrate that the assessment has not fully considered indirect ecosystem impacts and also whether it would change any conclusions related to significance of effects.	The Applicant approach as detailed in APP-063 is that for offshore ornithology, the following potential impacts were considered within the inter-related assessment: • Disturbance and displacement from airborne noise, underwater sound, and presence of vessels and infrastructure. • Indirect impacts from underwater sound affecting prey species. • Temporary habitat loss/disturbance and increased Suspended Sediment Concentrations. • Collision risk. • Barrier effects. While these assessments are welcome, this does not include those listed in the question, in particular species energy expenditure and ocean stratification. There is potential for seabirds to have greater energy expenditure as a result of, for example, loss of foraging opportunities, greater commuting flight times, and increased metabolic costs of flight in areas with turbulence flumes. While these to a limited extent are considered with the analysis of displacement and barrier effects under mortality rate, they are not explicitly considered in the assessment.

ExQ1	Question to:	Question	RSPB response
			Changes in ocean stratification have also not been explicitly considered. Such changes in hydrodynamic regimes can have subsequent effects on the stability and strength of oceanographic features such as tidal mixing fronts[1]. These fronts are important drivers of the spatio-temporal availability of prey species for seabirds[2] and so modification to these through the presence of turbines can have profound effects on the distribution and fitness of these species. RSPB Cymru is concerned that these consequences of modifications to oceanographic dynamic have not been properly addressed.
1.18: Onshore Biodiversity, Ecology and Natural Environment -			
Q1.18.8	DCC, CCBC, NRW (A), **RSPB Cymru**, NWWT	OLEMP [REP2-034] Are you satisfied with the Applicant's onshore/landfall approach to: (i) habitats - mitigation, management, and monitoring; and (ii) protected species – mitigation, management, and monitoring. If not, can you provide reasons with supporting evidence to justify your position.	This is not an area covered in our Relevant Representation. However, RSPB Cymru is satisfied with the Applicant's approach to onshore matters, although there is a disparity in the application of timing restrictions between offshore and landfall that has been raised by NRW. There are timing restrictions for offshore export cable installation activities within the Liverpool Bay SPA whereas no timing restrictions have been applied to the cable landfall. This inshore area does support overwintering common scoter which could

[1] Isaksson, N., Scott, B.E., Hunt, G.L., Benninghaus, E., Declerck, M., Gormley, K., Harris, C., Sjöstrand, S., Trifonova, N.I., Waggitt, J.J. and Wihsgott, J.U., 2023. A paradigm for understanding whole ecosystem effects of offshore wind farms in shelf seas. *ICES Journal of Marine Science*, p.fsad194.

[2] Cleasby, I.R., Owen, E., Miller, P.I., Jones, R.J., Wilson, L.J. and Bolton, M., 2024. Functional responses of a medium-ranging marine predator highlight the importance of frontal zones as foraging locations. *Marine Ecology Progress Series*, *740*, pp.175-191.

ExQ1	Question to:	Question	RSPB response
			be potentially displaced during the cable landfall activity. We defer to Natural Resources Wales as to whether they are satisfied with the level of information covering mitigation, management, and monitoring.